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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA
9

10 FEDERAL TRADE COMMISSION

11 Plaintiff,

12 v.

13 SUPERIOR SERVICING LLC, *et al.*,

14 Defendants.
15

Case No. 24-cv-2163-GMN-MDC

**DECLARATION OF FTC COUNSEL
LUIS H. GALLEGOS IN SUPPORT
OF APPLICATION FOR ENTRY OF
DEFAULT**

16
17 I Luis H. Gallegos, hereby declare as follows:

18 1. I am over twenty-one years of age and a citizen of the United States. I am an
19 attorney employed by and representing the Federal Trade Commission (“FTC”) in the above-
20 captioned action.

21 2. I am a member in good standing of the state bar of Oklahoma. I am authorized to
22 practice in this District pursuant to LR IA 11-3. My business address is 1999 Bryan Street, Suite
23 2150, Dallas, TX 75201. Unless stated otherwise, I have personal knowledge of the facts stated
24 herein and, if called as a witness, would competently testify thereto.

1 3. The FTC filed its Amended Complaint in this action on March 26, 2025, (ECF
2 No. 57) naming Superior Servicing LLC, Sunrise Solutions USA, LLC, Alumni Advantage LLC,
3 Student Processing Center Group LLC, SPCTWO LLC, and Accredited LLC, among others, as
4 defendants. The Amended Complaint alleges that Defendants engaged in deceptive practices in
5 connection with the marketing of student loan debt relief services in violation of Section 5(a) of
6 the FTC Act, 15 U.S.C. § 45(a), the Telemarketing Sales Rule, 16 C.F.R. Part 310, Section 521
7 of the Gramm-Leach-Bliley Act, 15. U.S.C. § 6821, and the FTC's Trade Regulation Rule on
8 Impersonation of Government and Businesses, 16 C.F.R. Part 461.

9 4. On April 15, 2025, Defendants Superior Servicing LLC, Sunrise Solutions USA
10 LLC, Alumni Advantage LLC, Student Processing Center Group LLC, SPCTWO LLC, and
11 Accredited LLC were served summonses and copies of the Amended Complaint by way of
12 electronic service to the Receiver, Krista Freitag, appointed by the Court in this action. (ECF
13 Nos. 9, 30, and 42)

14 5. As the court-appointed Receiver, Ms. Freitag may properly accept service on
15 behalf of these entities because she has been authorized to "[a]ssume full control of Receivership
16 Entities" and each of these Defendants has been identified as a Receivership Entity by both the
17 Receiver and the Court. *See* Preliminary Injunction as to Dennise Merdjanian, ECF No. 42, at pp.
18 6 and 15 (ECF pp. 6 and 16); Receiver's First Interim Report, ECF No. 23, at pp. 13-14.

19 6. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), a defendant must file
20 a responsive pleading within 21 days of being served with a complaint and summons. Here, that
21 deadline for Defendants Superior Servicing LLC, Sunrise Solutions USA LLC, Alumni
22 Advantage LLC, Student Processing Center Group LLC, SPCTWO LLC, and Accredited LLC was
23 May 6, 2025.

